

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JOEY KIMBROUGH,

Plaintiff,

v.

AMERICAN EXPRESS COMPANY AKA
AMERICAN EXPRESS NATIONAL BANK

and

TRANS UNION LLC

Defendants.

Case No. 1:22-cv-01993-TWP-MJD

**AMERICAN EXPRESS NATIONAL
BANK RESPONSE IN
OPPOSITION TO PLAINTIFF
JOEY KIMBROUGH'S NOTICE
OF UNAUTHORIZED PRACTICE
OF LAW AND MOTION TO
COMPEL.**

**AMERICAN EXPRESS NATIONAL BANK'S RESPONSE IN OPPOSITION TO
PLAINTIFF'S NOTICE OF UNAUTHORIZED PRACTICE OF LAW
AND MOTION TO COMPEL**

In opposition to Plaintiff Joey Kimbrough's ("Plaintiff") Notice of Unauthorized Practice of Law and Motion to Compel Defendant American Express National Bank ("American Express"), by and through the undersigned counsel, states the following:

1. Counsel Elise Haverman filed her papers pursuant to Local Rule 83-5 to be admitted to the United States District Court for the Southern District of Indiana and paid all applicable fees prior to the notice of appearance filed in this case.
2. As such, Elise Haverman filed the notice of appearance in good faith, but inadvertently did not take the separate telephone oath of attorney. That oath was taken on May 17, 2024.
3. As of today's, date, Elise Haverman has complied with all local rules and requirements. As such, Elise Haverman is admitted and authorize to practice law in this honorable

court. Such admittance is reflected on the United States District Court for the Southern District of Indiana website's roll call of admitted attorneys.

Therefore, American Express respectfully requests that this Court deny Plaintiff's Notice of Unauthorized Practice of Law and Motion to Compel as moot.

Dated: May 20, 2024.

Respectfully submitted,

By: /s/ Elise K. Haverman

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*Attorneys for Defendant American Express
National Bank*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 20, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system and certify that a true and correct copy of the foregoing was provided to all parties and counsel of record, including: joeykokomo2002@yahoo.com .

/s/ Elise K. Haverman
Attorney